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separately addressed in detail. However, applicants' decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that applicants concur with the Examiner's conclusion that these dependent claims are not patentable over the disclosure in the cited references. Similarly, applicants' decision not to discuss differences between the prior art and every claim element, or every comment made by the Examiner should not be considered as an admission that applicants concur with the Examiner's interpretation and assertions regarding those claims. Indeed, applicants believe that all of the dependent claims patentably distinguish over the references cited. However, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend. Therefore, in light of the amendments to independent Claims 1, 12, and 21, applicants respectfully request withdrawal of the rejection of dependent Claims 2, 4-8, 14-17, 19-20, and 22-26 under 35 U.S.C. § 102(b), and reconsideration of the claims in light of the amendments and the remarks below with regard to the Examiner's previous rejection under 35 U.S.C. § 103(a).

Rejections Under 35 U.S.C. §103

Claims 9 and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lakritz in view of "Basics of Server-Side JavaScript" (SSJ). The Examiner asserts that it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the method disclosed by Lakritz as disclosed by SSJ. As noted above, the elements recited in Claims 9 and 18 are now incorporated into Claims 1 and 12, respectively, and analogous elements are included in independent system Claim 21. Because of these amendments to Claims 1 and 12, applicants have cancelled Claims 3 and 13. Accordingly, applicants address the Examiner's rejection of Claims 9 and 18 in terms of Claims 1, 12, and 21 as now amended.

Respectfully, in light of the amendments made to clarify the independent claims, the claimed invention teaches away from Lakritz in view of SSJ. Lakritz concerns a system and method for localizing markup language documents *at the server*, as indicated at a number of points within the reference:

A preferred embodiment of the invention automatically determines the language and country of a Web site visitor *and directs the Web server to deliver the appropriate localized content* contained in one or more country/language databases *to the visitor's browser*.

1 Lakritz, Column 2, Lines 28 through 31 (emphasis added).

2 A preferred embodiment of the invention provides a comprehensive suite of  
3 three modules that allow a user to build, operate and maintain a multilingual *Web site*  
4 easily and efficiently. *The invention enhances an existing Web site by adding*  
5 *advanced multilingual content management and process control capabilities to the*  
6 *customer's Web server.*

6 Lakritz, Column 3, lines 38 through 46 (emphasis added).

7 With respect to FIG. 2, the Visitor module 202 works in tandem with a  
8 customer's existing *Web server 203. It automatically determines the language and*  
9 *country of a Web site visitor and directs the Web server 203 to deliver the*  
10 *appropriate localized content contained in one or more country/language databases*  
11 *and/or file-based content in a file system 204 to the visitor's browser 201.* Recently  
12 accessed localized content is placed into a Cache 206. *The content is placed in the*  
13 *Cache 206 so that if a similar request comes in for a document in that language and*  
14 *for that country, then the cached version will be pushed out to the browser 201.* This  
15 saves time and processor overhead for accessing the database and file system 204 to  
16 rebuild the requested content.

14 Lakritz, Column 4, lines 3 through 15 (emphasis added).

15 The invention is scalable to provide multilingual presentation and management  
16 functions across *multiple servers* in a distributed environment. *For example, some*  
17 *sites might have English content on one server, Japanese on another, and so on.*  
18 *Each server will have installed on its respective site, an instance of the invention*  
19 *communicating with other instances of the invention throughout the system. One*  
20 *server is designated the master, and the others are slaves for the purpose of*  
21 *managing content.* The servers communicate over a dedicated interface allowing  
22 content to be managed in a distributed fashion. This configuration also supports  
23 mirrored sites across multiple servers.

22 Lakritz, Column 14, lines 37 through 38 (emphasis added).

23 The local default languages tell WebPlexer which language to use *in case the*  
24 *requested language is not available on the server.*

25 Lakritz, Column 19, lines 51 through 53 (emphasis added).

26 Indeed, throughout the description of Lakritz, the focus is entirely on multilingual documents  
27 being created and maintained on a web-server. Lakritz only contemplates server-side processing in  
28 creating and generating the documents, as indicated by the discussion of server side processing, such  
29 as "Multi-Country Server-Side Includes (MCSSI)" and "Multi-Language Server-Side Includes  
30 (MLSSI)," which are replete throughout the description of Lakritz (See Col. 58, line 32, through Col.

46, line 31) and all pertinent figures (see, for example, Figures 5 and 12 that depict the language object files as coupled with the web server) . Lakritz does not describe any of the language localization as taking place on the client side, and, thus, Lakritz teaches away from the claimed invention.

Furthermore, combining the applied reference, "Basics of Server-Side JavaScript," ©1997 Netscape (hereinafter "SSJ") with Lakritz further teaches away from the claimed invention. Server-Side JavaScript may be employed by one of ordinary skill in the art to implement the system described by Lakritz, as the Examiner notes (*see* Part 10 of the Office Action, pp. 4-5). However, one of ordinary skill in the art would not have combined those references, both of which focus entirely on server-side tag and phrase replacement, to arrive at a system that could render the claimed invention obvious.

In marked contrast to the cited references, the present application recognizes difficulties inherent in a centralized, server-based document localization facility and indicate how the claimed invention both differs from and provides advantages over systems like those described in the applied references:

Recently, there has been a substantial increase in application program features that enable users to access *network* resources, such as various data and applications available on the Internet. In order to facilitate these added features, the UIs in these applications typically include hypertext markup language (HTML) pages. *The use of such HTML pages in the UI presents a similar problem with respect to supporting different languages, i.e., a separate set of HTML pages generally has to be supplied for the UI in each language that is supported by an application. Optionally, localization of the HTML pages for the UI may be provided through use of a plurality of Active Server pages that access language-specific strings stored in a database. Neither of these options is an ideal solution to the problem.*

Applicants' specification, Page 1, line 24, through Page 2, line 7 (emphasis added).

In the method, the markup language document is written to include a plurality of references corresponding to text, graphic, and/or media objects that are to be presented and which include content in the specified language that will be employed when the markup language document is rendered. A set of localized objects in the specified language is provided so that it can be locally accessed (e.g., *the localized objects are stored on the hard disk of a user's computer*). . . .

Another aspect of the present invention is directed to a method that enables an application program to include a UI adapted to support a plurality of different languages through use of a single set of markup language documents, which are not specifically

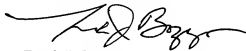
1 coded in each of the different languages. *Sets of localized objects corresponding to*  
2 *each of the languages supported by the UI are stored in a dll file on a user's*  
3 *computer.* Based on a user-specified language, placeholder references corresponding to  
4 various global objects in the markup language documents are replaced with localized  
5 objects through use of the dll file, the reference file, and JavaScript code contained in  
6 the markup language documents. Accordingly, the UI comprises a plurality of display  
7 pages each corresponding to a different one of the plurality of markup language  
8 documents. The display pages include objects that are rendered to convey content in the  
9 selected language.

10 Specification, Page 3, line 22, through Page 4, line 16 (emphasis added). Thus, the claims, as  
11 amended, are both supported and intended by the Specification.

12 Independent Claims 1, 12, and 21 all recite that a set of localized objects in the specified  
13 language are provided on a *client* computer or client system, and the placeholder references in the  
14 markup language document resolve the placeholder references locally. Accordingly, applicants  
15 respectfully submit that Claims 1, 12, and 21 as amended do not claim inventions that would have  
16 been obvious to one ordinarily skilled in the art with knowledge of Lakritz, JSS, or any other method  
17 or system known at the time the invention was made. Thus, Applicants respectfully request entry of  
18 the amendment, and reconsideration, and withdrawal of rejection of Claims 1, 12, and 21.  
19 Furthermore, because dependent claims are considered to include all of the elements of the  
20 independent claims from which the dependent claims ultimately depend, the rejection of remaining  
21 depending claims 35 U.S.C. § 102(b) over Lakritz in view of SSJ should also be withdrawn.

22 In view of the amendments noted above and the Remarks set forth above, it will be apparent  
23 that the claims in this application define a novel and non-obvious invention, and that the application  
24 is in condition for allowance and should be passed to issue without further delay. Should any further  
25 questions remain, the Examiner is invited to telephone applicants' attorney at the number listed  
26 below.

27 Respectfully submitted,

28 

29 Frank J. Bozzo  
30 Registration No. 36,756

FJB/RMA:lrg

1 MAILING CERTIFICATE:

2 I hereby certify that this correspondence is being deposited with the U.S. Postal Service in a sealed  
3 envelope as first class mail with postage thereon fully prepaid addressed to: Commissioner for Patents,  
4 Alexandria, VA 22313-1450, on January 3, 2005.

5 Date: January 3, 2005

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